

**Counsel at end of document**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**DEPARTMENT OF FAIR EMPLOYMENT  
AND HOUSING, an agency of the State of  
California.**

) Case No. C 07-3747 PJH

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**STIPULATION AND [PROPOSED]**

## STIMULATION AND PROPOSE ORDER EXTENDING EXPERT

#### DISCOVERY CUTOFF AS TO EXPERT

DISCOVERY CENTER  
MICHAEL ROBBINS

Plaintiff

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VS.

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## **STIPULATION**

Defendant Lucent Technologies, Inc., plaintiff Department of Fair Employment and Housing and plaintiff-intervenor Steven Caraudo, collectively referred to herein as “parties” jointly stipulate as follows:



1. This Court's most recent order set forth the Non-expert and Expert Discovery Cutoff as October 3, 2008.

2. While all other depositions will be completed by all parties on or before the current Cutoff, the deposition of human resources expert Michael Robbins cannot practicably be completed by that date given his need to review various fact witness depositions in order to update his Rule 26 report and be deposed. The parties agree that it would be beneficial to have a brief extension of the above deadline as to this witness only.

3. Therefore, the parties request that this court set the following deadlines for the supplemental report and deposition of Michael Robbins:

<u>Deadline</u>	<u>Proposed Extended Date</u>
Supplemental Rule 26 Report of Michael Robbins	October 21, 2008
Deposition of Michael Robbins	October 29, 2008

4. Defendant does not waive any objection to the content of any supplemental report by this Stipulation.

**SO STIPULATED:**

Dated: September \_\_\_, 2008

# DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

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Chief Counsel

**SUSAN SAYLOR**  
Senior Staff Counsel

By: /s/ Susan Saylor

Susan Saylor  
Attorneys for plaintiff, DFEH

1 Dated: September 23, 2008

BOXER & GERSON, LLP

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4 Dated: September 23, 2008

By: /s/ Jean K. Hyams

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Jean K. Hyams  
6 Counsel for Steven Carauddo

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STEVEN R. BLACKBURN  
LESLIE J. MANN

10 By: /s/ Leslie J. Mann

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Leslie J. Mann  
12 Attorney for defendant  
13 LUCENT TECHNOLOGIES INC.

14 **ORDER**

15 The following deadlines are set for the supplemental report and deposition of Michael  
16 Robbins:

17 **Deadline**

18 Supplemental Rule 26 Report of Michael Robbins October 21, 2008

19 Deposition of Michael Robbins October 29, 2008

20 Dated: 9/24/08



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